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TELECOMMUNICATIONS INDUSTRY ASSOCIATION

January 17, 1995

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

William F. Caton, Acting Secretary
Federal Communications Commission
1919 M. Street, N.W., Rm 222
Washington, DC 20554

Re: PR Docket No. 93-61, Ex Parte
Automatic Vehicle Monitoring Systems

Dear Mr. Caton:

The attached letter summarizes the position of the cordless telephone industry, as represented by the Telecommunications Industry Association (TIA) Consumer Radio Section, regarding wideband forward links for the proposed Location and Monitoring Service (LMS). Please associate this material with the record of the above-referenced proceeding.

If there are any questions regarding this matter, please contact the undersigned.

Respectfully submitted,

Jay E. Padgett
Chairman, Consumer Radio Section
Telecommunications Industry Association

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TELECOMMUNICATIONS INDUSTRY ASSOCIATION

January 17, 1995

Re: PR Docket No. 93-61, Ex Parte
Automatic Vehicle Monitoring Systems

Chairman Reed E. Hundt:
Commissioner James H. Quello:
Commissioner Andrew C. Barrett:
Commissioner Susan Ness:
Commissioner Rachel B. Chong:

As you know, the cordless telephone industry, as represented by the Telecommunications Industry Association (TIA) Consumer Radio Section which I chair, as well as many other parties, continues to oppose establishment of the Location and Monitoring Service (LMS) in the 902-928 MHz band. That opposition is based partially on concerns about interference between Part 15 devices and LMS systems, and has been supported in the record of this proceeding by extensive technical data. With this letter, I would like to focus on one particular aspect of the interference issue: the potential for harmful interference from LMS wideband forward links to Part 15 applications, including cordless telephones.

While the Commission's Rules give Part 15 devices no guarantee of protection from interference by licensed transmitters, it is clearly in the public interest that the Commission make every effort to structure any new LMS Rules in a way that minimizes the potential for harm to existing users of the band. One step toward this objective would be to prohibit the use of wideband forward links (base-to-mobile transmissions).

For multilateration systems such as those of Teletrac and Pinpoint, the forward link is essentially a paging channel. Its purpose is to address a vehicle and request a response on the return (mobile-to-base) link. While there is an inherent need for a wideband return link (to give accurate location estimates), the paging function provided by the forward link does not require a wideband (i.e., spread spectrum) transmission format.

Pinpoint's LMS system concept includes a wideband forward link, meaning that spread spectrum techniques are used, and the bandwidth is consequently much greater than the bandwidth that would be required with conventional narrowband digital modulation techniques. Indeed, Pinpoint's entire forward link throughput requirement, for both polling and messaging functions, could be met with a single non-spread spectrum forward link with less than 500 kHz of bandwidth for a fully-loaded system (1500 locations/second). A relatively narrowband forward link,

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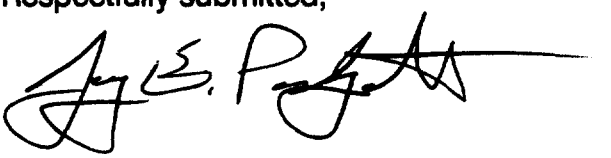
located near the upper band edge, could therefore support the functionality envisioned by Pinpoint, and would constitute much less of an interference threat to consumer devices than a wideband (e.g., 6-8 MHz) forward link.

If you decide to adopt new LMS Rules in the 902-928 MHz band, I urge you to prohibit the use of wideband (spread spectrum) forward links, and to confine all LMS forward link transmissions to the band 927.25-928 MHz. By doing so, you will prevent the development of an unnecessary interference threat to millions of consumer devices.

Respectfully submitted,



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